



MARKETING COMMUNICATION POLICY

INTRODUCTION

THE CARLSBERG GROUP'S MARKETING COMMUNICATION POLICY

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The Carlsberg Group has focused on brewing for a better today and tomorrow for over 170 years. Not only for ourselves, but for society as a whole. We are proud of our brands, with all our beverages crafted to be enjoyed in moderation and sit at the heart of social occasions for millions of people all over the world.

We are committed to playing our role in supporting people to consume our products responsibly, as they are intended, and recognise our important responsibility to do so. Our Marketing Communication Policy (MCP) supports this commitment, determining the high standards we set ourselves as a brewer and as an industry for what and how we communicate to ensure that we reach the right people, with the right messages. It applies to all employees and contractors communicating through, or on behalf of, our brands. However, in cases where local regulations are stricter, they must always supersede this policy.

Our MCP exists to enable, rather than to restrict. Through the eight principles which guide our marketing, with clear dos & don'ts under each, we are able to develop innovative, creative and entertaining marketing in the confidence that it aligns with our purpose and high standards as a responsible brewer.

João Abecasis
Chief Commercial Officer
Carlsberg Group

1. APPEAL

DESIGN COMMUNICATIONS TO APPEAL TO ADULT AUDIENCES

Our beers, ciders and other alcoholic products are intended only for persons over the legal drinking age. Our marketing communications must always therefore be designed to appeal only to adults.

DOS & DON'TS

- ✓ Only target adults (18+) with our messages and never persons under the legal drinking age stipulated in national or regional law (e.g. 20 in Iceland).
- ✓ Only feature people who are – and reasonably appear to be and are being portrayed as – over 25 years of age.
- ✗ Do not include any of the following in our marketing materials:

People, styles or behaviours: Celebrities, sportspersons, actors, influencers, cartoon or animated characters, clothing styles, behaviours, music etc. **with primary appeal to persons under the legal drinking age, or to juvenile or adolescent behaviour.**

Elements: Toys, playgrounds, schools, zoos, skate parks, children's gaming arcades, child-related fantasy worlds, slapstick humour, sexual humour or digital marketing elements (e.g. lenses or filters) that are likely to be of particular appeal to those under the legal drinking age.

Themes or treatments: Children's music, fairy tales, schoolteachers, or drawing styles, symbols and designs that are clearly childish (e.g. children's scribbles or drawings).

Promotional items: Competition prizes etc. **with primary appeal to persons under the legal drinking age.**

PR & SPONSORSHIPS

- ✓ While any person appearing in advertisements must be over 25 years of age, persons between the minimum legal drinking age and 25 years of age may be engaged in unpaid PR activity (e.g. gifting) or partner-led sponsorship communication in which our brand is not a primary focus (e.g. Carlsberg Man of the Match).
- ✗ Do not repost or interact with social media posts featuring, or posted by, persons aged 18-25 years, from the profile of our alcoholic brands. Do not encourage 18-25-year-old recipients of alcoholic gifts to post on social media.

PROMOTIONS

- ✓ Only target in-store or in-outlet promotions at persons over the legal drinking age. Brand promoters must be of legal drink age or above and cannot feature in communications of the promotion unless they are over 25 years.

PRODUCT DEVELOPMENT & PACKAGING

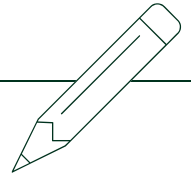
- ✗ Do not develop new alcoholic products or packaging designs with particular appeal to persons under the legal drinking age.

RESEARCH

- ✓ Only include adults over the legal drinking age within the study market when conducting research activities related to our alcoholic brands. See our internal Research & Analytics Code of Conduct for further guidance.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



- ☒ Can I confirm that my communication is designed to appeal to an adult audience?
- ☒ Can I confirm that my communication only uses persons who are, and reasonably appear to be, over the age of 25?
- ☒ Have I checked that my communication does not include any excluded elements, people, themes or promotional items?

ASSOCIATED CODES

- WFA's Responsible Marketing Pact
- Carlsberg Group Research & Analytics Code of Conduct

2. PLACEMENT

ACTIVELY RESTRICT PEOPLE UNDER THE LEGAL DRINKING AGE FROM BEING EXPOSED TO OUR COMMUNICATIONS

Our marketing must always be placed in environments that primarily reach people above the legal drinking age. Where available, we must implement restrictive measures that prevent people under the legal drinking age from seeing our marketing communications.

DOS & DON'TS

MEDIA AND PLACEMENT

- ✓ Always activate age affirmation mechanisms (age gates) whenever they are available.
- ✓ Only promote brands in media (including digital), events or programmes where at least 70% of the audience is above the legal drinking age (no more than 30% is below) based on demographic data – on all channels where age affirmation mechanisms are not available.
- ✓ In addition to the above, always use data to ensure that adverts are targeted appropriately on digital channels where age affirmation mechanisms are not available. Where possible, use interest-based factors to remove demographics that may be under the legal drinking age, as well as self-declared age data. Always compile a brand safety list to prevent brand content being placed near underage content.
- ✓ Always apply the five Digital Guiding Principles to our brands' owned digital channels, including social media channels and websites:

Age gate: Always use an age affirmation mechanism (age gate) whenever they are available to limit underage access. Where not available, include an age disclaimer stating that content is only intended for users above the legal drinking age.

Forward advice notice (FAN): Always include a forward advice notice in an account's bio where content-sharing functionality is available – clearly stating that the content should only be shared with persons above the legal drinking age in the country of viewing.

Responsible drinking message: Always include a clearly visible responsible drinking message in an account's bio.

Transparency / official signpost: Always verify owned digital platforms to help users identify them as official through either an official verification sign such as "✓" or a written statement such as "This is the official <brand name> channel".

User-generated content guidelines: Never engage with any user-generated content (UGC) that would promote irresponsible alcohol consumption or otherwise breach guidelines in this policy, and inform users that irresponsible content will be removed through a UGC policy.

- ✓ Always take reasonable steps to prevent the placement of advertising in close proximity (100 metres or less) to places primarily frequented by minors, including schools, zoos and playgrounds. Also, take into account religious buildings or places with sensitivities to alcoholic brands.
- ✓ Always gain approval from Group Commercial's media team before commencing any advertising relating to gaming.

INFLUENCERS

- ✓ Always apply the following principles to paid, incentivised or unpaid influencer content where we have a contractual or other material relationship in place:

Selection: Wherever platforms allow, employ age affirmation mechanisms on digital platforms to paid influencer content to prevent minors from viewing content associated with our alcoholic brands. When using platforms where these mechanisms are not yet available, always ensure that paid influencers are at least 25 years old and have primary appeal to adult audiences.

Never associate with influencers who feature posts that would not be compliant with this policy or are known to have reputational associations with harmful drinking or behaviours that could bring our brands into disrepute.

Engagement: Always have a signed written agreement in place for paid influencers with either us or our agencies, including: information linking to local legal requirements, guidelines on clear disclosure of their association with our brand, guidelines on responsible marketing (as set out in this policy), and advice on and examples of best practices.

Monitoring: Always monitor paid influencer content for compliance with this policy, aiming to remove any non-compliant posts within 72 hours.

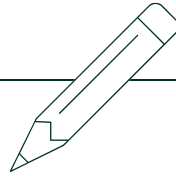
POINT OF SALE & EVENTS

- ✓ Only allow sampling of alcoholic beverages by persons over the legal drinking age.
- ✓ Only engage persons above the legal drinking age in experiential marketing of our brands.

2. PLACEMENT

ACTIVELY RESTRICT PEOPLE UNDER THE LEGAL DRINKING AGE FROM BEING EXPOSED TO OUR COMMUNICATIONS

SENSE CHECK



Check that you are on the right track by answering yes to the following questions:

- ☒ Where age affirmation mechanisms are available, have I activated them to age-gate content from those under the legal drinking age?
- ☒ Where age affirmation mechanisms are not available, do I have audience data on all channels confirming that at least 70% of the audience is above the legal drinking age? In addition, have I used data (including interest-based factors) to ensure, as far as possible, that the audience is likely to be above the legal drinking age?
- ☒ Do my brands' owned social media channels comply with our Digital Guiding Principles by implementing an age gate, forward advice notice, responsible drinking message, validation (transparency/official signpost) and UGC policy?
- ☒ Does my influencer campaign comply with our principles for selection, engagement and monitoring?
- ☒ Do I have measures in place to prevent people under the legal drinking age from accessing our products at events that we organise and control?

ASSOCIATED CODES

- IARD's Digital Guiding Principles
- The Carlsberg Group's event security guidelines

1 APPEAL	2 PLACEMENT	3 MODERATION	4 SAFETY	5 EFFECTS	6 TRANSPARENCY	7 PROGRESSION	8 ALCOHOL-FREE
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3. MODERATION

ADVOCATE RESPONSIBLE DRINKING AND ENJOYMENT IN MODERATION

Our marketing communications must always advocate responsible drinking, moderation and enjoyment of our products as part of a balanced, healthy lifestyle.

DOS & DON'TS

ADVERTISEMENTS

- ✓ Always show our products being enjoyed in moderation as part of a balanced, healthy lifestyle.
- ✗ Never encourage excessive or irresponsible drinking, show drunkenness or suggest that it is normal or acceptable to be drunk.
- ✗ Never present abstinence in a negative way, and instead, always show respect for those who choose not to drink alcohol.
- ✓ Always incorporate responsible drinking messaging as mandatory in all marketing and brand communication briefs for all touch points of our alcoholic products (including web, social media and video commercials) and print materials. This should be in a size that is clearly legible.

POINT OF SALE & EVENTS

- ✓ Always ensure that sampling activities are conducted in a way that has the necessary safeguards and protocols to prevent persons who are underage, intoxicated or driving from taking part. Never pressure people to consume our products.
- ✗ Never sponsor activities, such as “drinking games”, that encourage rapid or excessive consumption of alcohol.
- ✓ Always make an alcohol-free beer, water or carbonated soft drink available at events for those who do not wish to drink alcohol.

MEDIA & PLACEMENT

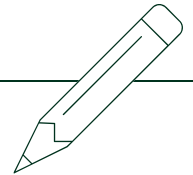
- ✓ Always actively monitor owned branded websites and social media pages and, wherever possible, remove user-generated content advocating or showing irresponsible drinking.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:

Am I sure that...

- ☒ my communication does not encourage or normalise the excessive consumption of alcohol?
- ☒ my communication does not present abstinence or moderation in a negative way?
- ☒ my communication includes a responsible drinking message that is clearly legible?
- ☒ my trade activation and/or sampling activity does not encourage excessive drinking?



4. SAFETY

NEVER ASSOCIATE CONSUMPTION OF OUR PRODUCTS WITH DRINK DRIVING, POTENTIALLY DANGEROUS ACTIVITIES OR ANTISOCIAL BEHAVIOUR

Drinking alcohol can affect inhibitions and decision making, which means it is not safe in certain situations, such as when driving or operating dangerous machinery. We must never therefore associate consumption of our products with potentially dangerous activities or other situations where it would be unsafe or unwise.

DOS & DON'TS

ADVERTISEMENTS

- ✗ Never show consumption of alcohol in situations where it would be unsafe or unwise, such as driving any kind of motor vehicle, operating machinery, in dangerous environments such as clifftops or water rapids, or where individuals are demonstrating bravado or daring behaviour, including participating in activities such as extreme sports (e.g. skydiving).
- ✗ Never associate consumption of our products with violent, aggressive, dangerous or anti-social behaviour.
- ✗ Never associate consumption of our products with gambling, weapons, tobacco or illegal activities, including those related to drugs or drug culture. Never glamourise or trivialise associated issues.
- ✗ Never associate consumption of our products with violent sports (e.g. boxing, martial arts) or blood sports (e.g. bullfighting).
- ✗ Never show our alcoholic brands being consumed by people actively participating in sports (though it is acceptable to show our alcoholic products being consumed after participation, provided this otherwise complies with this policy).

PR & SPONSORSHIPS

- ✗ Never sponsor activities, events or individuals involved with gambling, violent sports, extreme sports, tobacco, illegal drugs, sports that cause harm to animals or sports that are likely to be of particular appeal to children (e.g. skateboarding).

- ✗ Do not associate consumption of our products with any motor sports, motor events or other similar activities (due to concerns about the dangers of drinking and driving), unless specifically promoting responsible drinking in connection with our alcohol-free brands (e.g. don't drink and drive) *.

POINT OF SALE & EVENTS

- ✓ Always comply with our Brand Promoter Manual. When engaging with brand promoters at events or as part of any other sponsorship or marketing activation, we must fulfil our commitment to provide a healthy and safe working environment, regardless of where in the world this takes place.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:

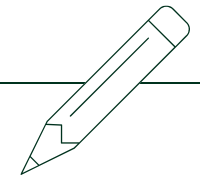
Am I sure that my communication **does not** associate consumption of our alcoholic products with...

- ☒ violence, aggression and anti-social behaviour?
- ☒ gambling, weapons, tobacco or drugs?
- ☒ potentially dangerous activities, such as driving or extreme sports?
- ☒ bravado or daring behaviour?

* For guidance on alcohol-free beers, see principle 8 on pages 11-12.

ASSOCIATED CODES

- The Carlsberg Group's Brand Promoter Manual



5. EFFECTS

NEVER CLAIM THAT ALCOHOL CAN CONTRIBUTE TO INDIVIDUAL SUCCESS, ENHANCE ABILITIES OR BENEFIT HEALTH

While our products can be presented as an enjoyable part of social life, our marketing communications must not suggest that drinking alcohol can contribute to personal social success or acceptance. We must avoid suggesting that the success of a social occasion is linked to drinking alcoholic beverages, or that alcoholic beverages offer health or performance benefits.

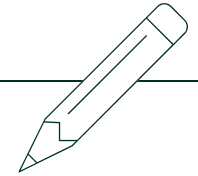
DOS & DON'TS

ADVERTISEMENTS

- ✗ Never suggest that consumption of alcoholic products can contribute to personal social success, acceptance, popularity or confidence, or the success of a social occasion.
- ✗ Never suggest that our products can contribute to sexual success or enhance a person's sexual attractiveness.
- ✗ Never suggest that the consumption of alcohol can be a catalyst for an extreme change in mood or state, that it can be used to solve personal problems, or that it can reduce social anxiety or overcome boredom and loneliness.
- ✗ Never suggest that our products can act as an aid to removing personal inhibitions.
- ✗ Never give the impression that alcoholic products can enhance mental ability or improve physical performance. If sports are featured, it must be clear that consumption takes place after the sporting activity has ended.
- ✗ Never attempt to hide the nature or strength of an alcoholic beverage, place improper emphasis on its alcoholic strength, or indicate that it is preferred due to its superior strength. It is, however, permissible to emphasise the low strength of our alcohol-free beers*.
- ✗ Never claim that drinking alcohol can provide health or dietary benefits**.
- ✗ Never claim, or make reference to claims, that alcohol can prevent, treat or cure any human disease.

- ✗ Do not target pregnant women or portray pregnant women consuming our products.

SENSE CHECK



Check that you are on the right track by answering yes to the following questions:

Can I confirm that the characters in my advert do not appear...

- ☒ to have significantly altered their mood or state by drinking alcohol?
- ☒ to have used alcohol as a catalyst to solve personal problems or reduce social anxiety?
- ☒ to be more socially or sexually successful or attractive after drinking alcohol?
- ☒ to have enhanced mental ability or physical performance after drinking alcohol?

Can I confirm that my communication does not...

- ☒ suggest that alcohol can provide health or dietary benefits?
- ☒ attempt to hide the nature or strength of the beverage, or place improper emphasis on its ABV?

* For guidance on alcohol-free beers, see principle 8 on pages 11-12.

** This does not restrict the communication of nutritional information and facts. For guidance, see page 9. Always consult your local Legal and Corporate Affairs team if unsure.

6. TRANSPARENCY

PROVIDE TRANSPARENT INFORMATION ABOUT OUR PRODUCTS

Consumers have the right to know what is in our products, so we always provide transparent information about our beverages' nutritional values, ingredients and alcohol content on our packaging and online.

DOS & DON'TS

PACKAGING

- ✓ Always list ingredients and provide calorific information per 100 ml on consumer-facing primary packaging and websites for our beer, cider and ready-to-drink (RTD) brands. Ensure provision, either on pack or online, of all seven nutritional measures (energy, fat, saturated fat, carbohydrate, sugars, protein, salt).
- ✓ Always carry a responsible drinking message (e.g. drink responsibly) and a clear age restriction symbol or equivalent words for the legal drinking age on consumer-facing primary packaging. Brands can also include a second responsible drinking symbol discouraging either consumption during pregnancy or drinking and driving.
- ✓ Always carry the URL of a website (brand or corporate) containing information about a product's ingredients and nutritional information, and the risks associated with excessive alcohol consumption on consumer-facing primary packaging.

MEDIA & PLACEMENT

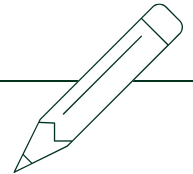
- ✓ Always carry information on responsible drinking and the risks associated with excessive alcohol consumption within one click of the landing page on our brands' websites.

PRODUCT DEVELOPMENT

- ✗ Never produce or promote any alcoholic beverages that contain excessive amounts of added stimulants. Contact Group Development and Corporate Affairs with any questions.

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



- ☒ Does my beer, cider or RTD brand's primary packaging list ingredients and provide nutritional information per 100 ml?
- ☒ Does my beer, cider or RTD brand's primary packaging carry a responsible drinking message and a clear age restriction symbol or equivalent words for the legal drinking age?

7. PROGRESS

COMMUNICATE LEGALLY, TRUTHFULLY AND RESPECTFULLY, CHAMPIONING SOCIAL INCLUSION AND ENVIRONMENTAL SUSTAINABILITY

Our beers are at the heart of social occasions around the world. Driven by our purpose of brewing for a better today and tomorrow, we have a responsibility not only to be legal, truthful and decent in our communications, but also to push the boundaries of sustainability and champion a more inclusive world.

DOS & DON'TS

- ✓ Always ensure that our communications are ethical, transparent and truthful, and never misleading.
- ✓ Always evaluate communications for appropriateness, good taste and decency both for the target audience and wider society. Consider whether themes that seem harmless in one market could be offensive or culturally insensitive in other markets in which the Carlsberg Group operates.
- ✓ Always be sensitive to, and respectful of, diversity in respect of race, gender, sexual orientation, religion, colour, ethnicity, national origin, disability, wealth or profession. Avoid inappropriate or potentially harmful stereotypes. Always make an effort to actively promote diversity and inclusion in marketing campaigns, casting and materials.
- ✓ Always be sensitive to, and respectful of, groups or individuals who do not wish to associate with alcohol.
- ✓ Always check that communications and associated promotions comply with local laws. In cases where local regulations are stricter, they must always supersede this policy.
- ✓ Be careful to encourage and show consumer behaviour that is environmentally sustainable, such as disposing of packaging in recycling streams.

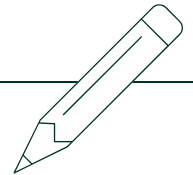
- ✓ Always ensure that any claim of sustainable environmental benefits is articulated clearly, in approachable language, and can be substantiated with solid evidence or scientific data, e.g. using a life cycle assessment (LCA) or recognised certification scheme (such as Cradle to Cradle (C2C)). For support, contact Corporate Affairs.

ASSOCIATED CODES

- The Carlsberg Group's Diversity & Inclusion Policy
- The Carlsberg Group's Environmental Policy

SENSE CHECK

Check that you are on the right track by answering yes to the following questions:



- ☒ Does my communication comply with local laws on alcohol promotion and general advertising legislation?
- ☒ Have I evaluated my communication for appropriateness, good taste and decency for both the target audience and wider society?
- ☒ Does my communication push, advance or take a leadership role in our desire to drive greater inclusivity in society?
- ☒ Can we substantiate our environmental statements with solid evidence?

8. ALCOHOL-FREE

OFFER CHOICE THROUGH ALCOHOL-FREE BEERS AND MARKET THEM RESPONSIBLY

Through our alcohol-free beers, we are committed to offering consumers a positive choice when they want to enjoy the taste of a refreshing beverage but without alcohol. Our communications should always target adults and our alcohol-free beers should be clearly distinguished from alcoholic variants.

APPLICABLE BRANDS

ALCOHOL-FREE BEERS (AFBs)

For the purpose of this policy, the term alcohol-free beer (AFB) covers any beer, cider or radler that is a line extension of a brand containing alcohol and contains no more than 0.5% alcohol by volume (ABV) (e.g. Carlsberg 0.0), unless local regulations state lower. Brands meeting these criteria must follow the entire policy, with exceptions or additional requirements provided in this section.

Communications relating to alcohol-free beverages with no connection to alcoholic brands should follow local soft drinks regulations and industry standards.

DOS & DON'TS

- ✓ Always comply with the standards set out in this policy, including always aiming to appeal to (principle #1) and reach (principle #2) persons over the legal drinking age with our communications, with only those exceptions provided for below.

ADVERTISEMENTS

- ✓ Always be clear and transparent about the fact that we are marketing alcohol-free products. Any communication should ensure that there can be no confusion between our AFBs and our alcoholic brands.
- ✓ Only state facts regarding health or performance benefits if we have substantiated scientific evidence. These facts should only be used after consulting with Corporate Affairs, Group Development and local Legal teams.

- ✓ AFBs can be associated with:

- **Driving:** We can present AFBs as a responsible choice for those who are driving. However, alcohol-free products must only be shown being consumed before or after driving, not during. Consideration must always be given to local driving laws. Always get approval from your local Legal and Corporate Affairs teams.
- **Sports:** We can present AFBs as an appropriate choice for refreshment in connection with non-violent and non-extreme sports, such as running or cycling. They must not be seen to enhance performance. Always get approval from your local Legal and Corporate Affairs teams.

- ✗ Our AFB products should not target or be associated with:

- **Pregnant women:** Do not direct communications at pregnant women, or portray pregnant women consuming our AFBs.
- **Overtly dangerous situations:** Never associate our AFBs with situations that are overtly dangerous or violent by nature, e.g. extreme sports or operating heavy machinery.

PACKAGING & ADVERTISING

- ✓ While acceptable to include, our AFBs are exempt from our commitment to always include a responsible drinking message in communications and on pack.
- ✓ Always include a clear age restriction symbol or equivalent words for the legal drinking age for alcohol on consumer-facing primary packaging.

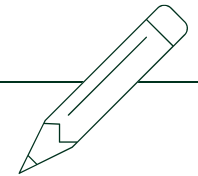
8. ALCOHOL-FREE

OFFER CHOICE THROUGH ALCOHOL-FREE BEERS AND MARKET THEM RESPONSIBLY

POINT OF SALE & EVENTS

- ✓ Only conduct sampling of alcohol-free beers with persons over the legal drinking age for alcohol.
- ✗ Never sell alcohol-free beers in children's or youth institutions or on other premises specifically devoted to those under the legal drinking age (e.g. schools).
- ✗ Never merchandise AFBs in areas of retail stores with particular appeal to persons under the legal drinking age for alcohol, e.g. next to sweets or toys.

SENSE CHECK



Check that you are on the right track by answering yes to the following questions:

- ☒ Is my communication targeted at adults?
- ☒ Does my communication explicitly state that the product is alcohol-free?
- ☒ Does my communication comply with this policy, with only exceptions provided for within this section?

COMPLIANCE & SCOPE

COMPLIANCE & SCOPE

COMPLIANCE

This policy represents the minimum standards for all Carlsberg Group brands and entities. Compliance is mandatory and the personal responsibility of all employees and contractors communicating through, or on behalf of, our brands. This applies both to the letter and the spirit.

In many cases, our policy contains standards that are stricter than required by local regulations. However, in cases where local regulations are stricter, they must always supersede this policy.

TRAINING

All marketing employees and marketing agencies must complete training in this policy, via online e-learning or face to face, at the beginning of their employment with the Carlsberg Group. This training should be repeated on an annual basis.

This policy must form an appendix to all relevant agency contracts, with its terms being mandatory.

SUPPORT

Local Legal and Corporate Affairs teams are able to provide support with interpreting the policy and local legislation. They should be consulted as early as possible during the development of marketing communications. When areas of doubt exist, or in the event of suspected non-compliance, the matter should be escalated to Group Commercial and Group Corporate Affairs departments.

SCOPE

This policy covers:

- All products and brands containing alcohol
- Applicable alcohol-free beers (AFBs) as detailed on pages 11-12.

It applies to any communication on behalf of brands in the two categories above, with channels including, but not limited to:

- **Media:** digital, broadcast, print, cinema, outdoor advertising, billboards and product placement.
- **Point of sale materials:** drinkware, serving materials/merchandise, eCommerce and clothing, communication and displays.
- **Sponsorships & PR:** sports teams, stadiums, music festivals, influencers (including individual athletes, artists) and media outreach.
- **Promotions:** consumer competitions, in-store offers, eCommerce offers, trade promotions, experiential activations, product placement and events.
- **Brand innovation and product development:** packaging, labelling and naming.
- **Third-party channels:** customer/supplier communications for our brands.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
ExCom	Responsible for policy approval.
Group Commercial (CCO)	Policy owner with overall responsibility to ExCom for marketing communication issues in the Carlsberg Group and for ensuring that material marketing communication risks in the Group are duly attended to and communicated to ExCom/the Audit Committee/the Supervisory Board as relevant.
Global/local Marketing Director	Responsible for ensuring that this policy is implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements.
Local brand owners	Responsible for verifying and validating marketing materials against the policy.
Local Legal Counsel & Corporate Affairs	Responsible for verifying marketing materials against legal requirements/stakeholder views/industry standards.
VP Corporate Affairs	Joint final decision-maker in the event of escalation.
VP Group Legal	Joint final decision-maker in the event of escalation.
Management, employees and contract workers of all entities in the Carlsberg Group	Responsible for adhering to this policy.



March 2021
Replacing September 2019 version

Carlsberg Breweries A/S
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营销传播 政策

引言

嘉士伯集团 营销传播政策

营销传播原则

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8	无酒精： 提供无酒精啤酒 以负责任的方式营销	11

创建于170年前的嘉士伯集团始终以创造更好的当下及未来为宗旨。这不仅仅是为了我们自己，也是为了整个社会。我们为品牌感到骄傲，而我们精心打造的各类饮料与啤酒已成为全世界数百万消费者在社交场合享用的重要消费品。

我们致力于鼓励消费者以负责任地态度消费我们的产品（这也符合他们的初衷），并承认我们有义务这么做。我们的《营销传播政策》支持这一承诺，确立了我们作为酿造者应当坚持的高标准，以及我们所在行业进行传播的内容与方式，确保将合适的信息传播给合适的人群。该政策适用所有雇员以及通过或代表我方品牌进行传播的承包商。但是，若任何地方的条例比该政策严格，则地方条例的效力始终优于本政策。

我们的《营销传播政策》旨在赋能而非限制。通过指导我们营销的八项原则（每项都清晰地列明了可为和不可为），我们能够开发创新的、有创意的且有趣的营销方式，且我们相信其将与我们作为负责任的酿造者所坚持的宗旨与高标准保持一致。

João Abecasis

首席商业官

嘉士伯集团

1. 吸引力

设计传播方式 以吸引成年观众

我们的啤酒、果酒及其他饮料产品仅向达到法定饮酒年龄的人群销售。因此，我们的营销传播必须始终面向成年人。

可为和不可为

- ✓ 我们的信息仅向成年人（18+）传播，禁止向低于国家或地方法律规定的法定饮酒年龄（例如，冰岛规定为20岁）的人群传播。
- ✓ 仅重点展示给25岁以上的人士（这些人应当看上去已满25岁，且应被描绘成已满25岁）。
- ✗ 禁止将以下事项纳入我们的营销材料：

人、风格或行为：对未达到法定饮酒年龄的人或青少年或青少年行为有较大吸引力的名人、体育人士、演员、有影响力的人、卡通或动画人物、穿衣风格、行为、音乐等。

要素：可能对未达到法定饮酒年龄的人具有特定吸引力的玩具、游乐场、学校、动物园、滑板公园、儿童游戏厅、与儿童有关的幻想世界、闹剧幽默、性幽默或数字营销元素（例如镜头或滤镜）。

主题或处理：儿童音乐、童话故事、教师，或明显幼稚的绘画风格、符号和设计（例如儿童涂鸦或绘画）。

促销品：对未达到法定饮酒年龄的人有较大吸引力的竞赛奖品。

公共关系与赞助

- ✓ 虽然广告中出现的任何人都必须年满25岁，可聘请年龄在最低法定饮酒年龄与25岁之间的人士参加无薪酬的公共关系活动（例如，赠送）或合伙人主导的赞助性传播，前提是我方品牌非主要关注点（例如，嘉士伯场上最佳球员）。
- ✗ 禁止从我们的酒类品牌简介中转发信息，或与关注18-25岁人士或由18-25岁人士发出的社交帖子互动。不鼓励接受酒精赠品的18-25岁人士在社交媒体上发帖。

促销

- ✓ 仅针对达到法定饮酒年龄的人士进行店内促销。品牌推广人必须已达到法定饮酒年龄，若未满25岁不能出现在促销活动中。

产品开发与包装

- ✗ 禁止开发对低于饮酒年龄的人士具有特定吸引力的新的酒精产品或包装设计。

研究

- ✓ 在从事与我们的酒类品牌相关的研究活动时，仅纳入研究市场上已达到法定饮酒年龄的成年人。有关进一步的指导，请参见我们内部的《研究与分析行为规范》。

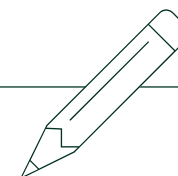
理性选择

回答以下问题，以确认您的认知及行为的正确性：

- ☒ 我能确认我的传播内容是针对成年观众而设计的吗？
- ☒ 我能确认我的传播仅采用已满且看上去已满25岁的人士吗？
- ☒ 我是否已核实我的传播内部不含任何除外要素、人、主题或促销品？

相关规范

- WFA的《负责人营销协定》
- 《嘉士伯集团研究与分析行为规范》



2. 广告投放

不向法定饮酒年龄以下的人群主动传播

我们的营销对象必须是已达到法定饮酒年龄的人群。我们应尽可能采取限制性措施，防止未达法定饮酒年龄的人群看到我们的营销传播。

可为和不可为

媒体与广告投放

- 如有，始终设置激活年龄确认机制（年龄确认弹出框）。
- 在所有不具备年龄确认机制的渠道，仅在符合以下要求的媒体（包括数字媒体）、事件或节目上推广品牌：基于统计数据，至少70%的观众已达到法定饮酒年龄（不超过30%低于法定饮酒年龄）。
- 始终用数据确保在没有年龄确认机制的数字渠道上适当地投放广告。若可行，采用基于兴趣的因素来排除可能低于法定饮酒年龄的人群以及自行声称的年龄数据。编制一份品牌安全清单，以防止品牌内容被放置在未成年人内容附近。
- 始终将五项数字指导原则用于我们的品牌自有数字渠道，包括社交媒体渠道及网站：

年龄确认弹出框：如有，采用年龄确认机制（年龄确认弹出框），以限制未成年人访问。如不可行，则提供年龄免责声明，注明该内容仅面向已达到法定饮酒年龄的用户。

提供建议通知（FAN）：始终在提供内容共享功能的帐户简历中包含提供建议通知 - 清晰地注明该内容只能被分享给所在国家的已达到法定饮酒年龄的观众。

负责任饮酒提示：帐户简历中应包括清晰可见的负责任饮酒提示。

透明性/官方提示：始终核实自有数字平台，以帮助用户通过官方认证标识（比如“✓”）或一份书面声明（比如“这是官方<品牌名称>渠道”）来确认其官方性。

用户生成内容指引：不得采用可能造成不负责任的酒精消费或违反本政策之指引的任何用户生成内容（UGC），并通知用户，将通过UGC政策去除上述不负责任的内容。

- 始终采取合理措施防止在未成年人经常出入地点附近（100米或以下）放置广告，包括学校、动物园及游乐场。同时考虑宗教场所或对酒精品牌较为敏感的地方。
- 在投放与博彩相关的广告之前必须获得集团商业部媒体团队的批准。

有影响力的宣传者

- 对于付费的、激励的或免费的有影响力的宣传者内容（我方拥有合约或其他实质关系），以下原则应适用：

选择：只要平台允许，将数字平台上的年龄确认机制应用于付费有影响力的宣传者内容，以防止未成年人看到与我们的酒精平台有关的内容。当采用不具备上述机制的平台时，应确保付费有影响力的宣传者已满25岁，且其主要对成年观众有吸引力。

不得与发布过不符合本政策的帖子或与有害饮酒或有损我方品牌形象的行为有关联的有影响力的宣传者合作。

聘用：我方或我方代理人应与付费有影响力的宣传者签订书面协议，约定与当地法定要求有关的信息，有关清晰披露其与我方品牌之关系的指引，有关负责任营销的指引（正如本政策中所述），以及关于最佳实践的建议及实例。

监督：始终监督付费有影响力的宣传者内容是否符合本政策，以便在72小时内删除任何不合规帖子。

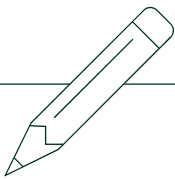
销售与事件要点

- 仅允许达到法定饮酒年龄的人士试饮酒精饮料。
- 仅聘请达到法定饮酒年龄的人士参与我方品牌的试验性营销。

2. 广告投放

不向法定饮酒
年龄以下的人群主动传播

理性选择



回答以下问题，以确认您的认知及行为的正确性：

- ☒ 若有年龄确认机制，我是否已激活该机制以应用于未达到法定饮酒年龄之人提供的年龄确认弹出框内容？
- ☒ 若无年龄确认机制，我是否拥有来自所有渠道的观众数据，以确认至少70%的观众已达到法定饮酒年龄？此外，我是否用数据（包括基于兴趣的因数）来确保（如有）观众可能已达到法定饮酒年龄？
- ☒ 若我的品牌自有社交媒体渠道是否通过执行年龄确认弹出框、提供建议通知、负责任饮酒提示、验证（透明性/官方指引）及UGC政策来遵循我们的数字营销指导原则？
- ☒ 我的宣传者活动是否遵循我们的选择、聘用及监督原则？
- ☒ 我是否制订了相关措施以防止未达法定饮酒年龄之人在我们组织及管理的产品中获得我们的产品？

相关规范

- 国际责任饮酒联盟（IARD）的《数字指导原则》
- 嘉士伯集团的《活动安全指引》

3.适度

提倡负责任的
饮酒态度并适度饮酒

我们的营销传播必须始终提倡负责任饮酒及适度饮酒，享用我们的产品作为平衡、健康生活方式的一部分。

可为和不可为

广告

- 始终展示适度享用我们的产品乃为平衡、健康生活方式的一部分。
- 禁止鼓励过量或不负责任的饮酒、展示醉态或暗示喝醉是正常的或可接受的。
- 禁止以负面方式描述戒酒，而应始终尊敬不饮酒的人。
- 始终在所有针对我方酒精产品的宣传材料及品牌传播简报（包括网页、社交媒体及企业宣传片）以及打印材料中纳入负责任饮酒提示，且其尺寸须保证清晰可见。

销售点与活动

- 始终确保试饮活动以一种有必要的保障措施和协议的方式进行，以防止未成年人、醉酒或驾驶的人参加。永远不要强迫人们消费我们的产品。
- 禁止赞助鼓励快速或过量饮酒的活动，比如“喝酒比赛”。
- 在组织相关活动时，为不愿喝酒的人提供无酒精啤酒、水或碳酸软饮料。

媒体及广告投放

- 主动监控自有品牌网站及社交媒体页面，并（若可行）删除提倡或展示不负责任饮酒的用户生成内容。

理性选择

回答以下问题，以确认您的认知及行为的正确性：

我是否确信……

- 我的传播内容不鼓励过量饮酒或者使其正常化？
- 我的传播内容不以负面方式展现戒酒或适度饮酒？
- 我的传播内容包含清晰可见的负责任饮酒提示？
- 我的交易激活及/或试饮活动不鼓励过量饮酒？

4. 安全

禁止将我们的产品消费与酒后驾驶、潜在危险活动或反社会行为联系起来

饮酒可能影响神经系统及决策，这意味着在某些情况下（比如开车或操作危险机器）饮酒是不安全的。因此，我们不得将消费我们的产品与潜在危险活动或其他不安全或不明智的行动联系起来。

可为和不可为

广告

- ✗ 有以下情形时不得展示酒精消费：不安全或不明智，比如驾驶任何类型的机动车或操作机械；危险环境，比如悬崖顶或急流；当任何个人有任何勇敢的行为时，包括参与极限运动（比如跳伞）。
- ✗ 不得将消费我们的产品与暴力、攻击、危险或反社会行为联系起来。
- ✗ 不得将消费我们的产品与赌博、武器、烟草或非法活动（包括与毒品或毒品文化相关的活动）联系起来。不得过度褒扬或贬低相关问题。
- ✗ 不得将消费我们的产品与暴力运动（比如拳击、武术）或血腥运动（比如斗牛）联系起来。
- ✗ 不得展示我们的酒精品牌被运动中的人士消费（但可以展示我们的酒精产品在运动完成后被消费，前提是这符合本政策）。

公共关系与赞助

- ✗ 不得赞助以下活动、事件或个人：赌博、暴力运动、极限运动、烟草、非法药品、可能给动物造成损害的运动或可能对儿童具有特别吸引力的运动，比如滑板。

- ✗ 不得将消费我们的产品与任何赛车运动、赛车赛事或其他类似活动联系起来（主要是担心酒后驾驶的危险性），除非我们的无酒精品牌专门宣传负责任的饮酒（例如，不得酒后驾驶）。*。

销售点与活动

- ✓ 始终遵守我们的《品牌推广者手册》。若聘请品牌推广者参与活动或作为任何其他赞助或营销活动的一部分，我们必须履行我们的承诺，提供健康及安全的工作环境，无论是在世界上任何一个角落。

理性选择

回答以下问题，以确认您的认知及行为的正确性：

我是否确认我的传播内容不会将消费我们的酒精产品与以下事项联系起来：

- ☒ 暴力、侵略及反社会行为？
- ☒ 赌博、武器、烟草或毒品？
- ☒ 潜在危险活动，比如驾驶或极限运动？
- ☒ 虚张声势或大胆的行为？

* 有关无酒精啤酒的指导，参见第11-12页原则8。

相关规范

- 嘉士伯集团《品牌推广者手册》

5. 作用

禁止宣称酒精有助于事业成功、改善能力或有益健康

尽管我们的产品可以作为社交生活的一部分而被推广，我们的营销传播不得暗示饮酒有助于社交成功或社会认可。我们应避免暗示社交场合的成功与饮用酒精饮料有关，或者酒精饮料提供了健康或业绩方面的福利。

可为和不可为

广告

- ✗ 不得暗示消费酒精产品有助于个人社交成功、认可、受欢迎度或自信，或在社交场合取得成功。
- ✗ 不得暗示我们的产品有助于性生活或提供个人的性魅力。
- ✗ 不得暗示饮酒是情绪或状态急剧变化的催化剂，可解决个人问题，可降低社交焦虑或可克服物料或孤独的情绪。
- ✗ 不得暗示我们的产品有助于消除个人压抑的情绪。
- ✗ 不得宣传酒精产品可改善心智能力或身体状况。若涉及运动，应注明消费发生在运动结束后。
- ✗ 不得试图隐藏酒精饮料的性质或酒精度，不恰当地强调其酒精度，或声明由于其良好的酒精度而成为首选。但是，允许强调我们的无酒精啤酒的低酒精度。*
- ✗ 不得宣称饮酒有助于改善健康或饮食。**
- ✗ 不得宣称或提及酒精可以预防、治疗或治愈任何人类疾病。

- ✗ 不得向孕妇推销，或者展示孕妇消费我们的产品。

理性选择

回答以下问题，以确认您的认知及行为的正确性：

我是否能确认我的广告中的人物看上去并非……

- ☒ 通过饮酒而显著改变了他们的情绪或状态？
- ☒ 用酒精作为解决个人问题或降低社交焦虑的催化剂？
- ☒ 饮酒后在社交或性方面更为成功或更具有吸引力？
- ☒ 饮酒后改善了心智能力或身体状况？

我是否能确认我的传播内容并未……

- ☒ 暗示酒精能改善健康或饮食？
- ☒ 试图隐藏酒精饮料的性质或酒精度，或不恰当地强调其ABV（酒精度）？

* 有关无酒精啤酒的指导，参见第11-12页原则8。

** 这并不限制传播营养信息及事实。参见第9页的指导。若有疑问，请咨询您当地的法律与公司事务团队。

6. 透明

提供有关我们产品的透明信息

消费者有权了解我们的产品成分，因此我们始终在包装及互联网上提供有关我们的饮料的营养价值、成分及酒精含量的透明信息。

可为和不可为

包装

- ✓ 在我们的啤酒、果酒及即饮饮料（RTD）品牌的外包装及网站上始终列明成分并提供每100毫升热量信息。确保在包装或互联网上提供所有七种营养的含量（能量、脂肪、饱和脂肪、碳水化合物、糖、蛋白质、盐）。
- ✓ 在面向消费者的外包装上提供负责任饮酒提示（例如，以负责任地态度饮酒）及清晰的年龄限制符号或与法定饮酒年龄有关的词语。品牌还可以包括一个负责任饮酒标识，劝阻在怀孕期间饮酒或酒后驾驶。
- ✓ 在面向消费者的外包装上提供一个网站（品牌或公司）的统一资源定位符（URL），其应包含有关产品成分及营养的信息，以及与过量饮酒有关的风险。

媒体与广告投放

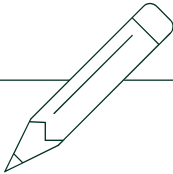
- ✓ 始终提供有关负责任饮酒的信息，以及与过量饮酒有关的风险（通过点击我们品牌网站上的登录页）。

产品开发

- ✗ 不得制作或宣传含有过量刺激物的酒精饮料。如有任何问题，请联系集团开发与公司事务部。

理性选择

回答以下问题，以确认您的认知及行为的正确性：



- ✓ 我的啤酒、果酒及RTD品牌的外包装是否列明了成分并提供了每100毫升热量信息？
- ✓ 我的啤酒、果酒及RTD品牌的外包装是否有负责任饮酒提示及清晰的年龄限制符号或与法定饮酒年龄有关的词语？

7. 进步

合法、真实且谦恭地从事传播，支持社会包容及环境可持续性

我们的啤酒是全世界社交场合的焦点。以创造更好的当下及未来为宗旨，我们有责任进行合法、真实且得体的传播，并推动可持续性支持一个更包容的世界。

可为和不可为

- ✓ 始终确保我们的传播是合乎道德的、透明的且真实的，不具有任何误导性。
- ✓ 始终评估传播内容对于目标观众及其他人群的适当性，是否具有较高的品味及是否得体。考虑在某个市场上看上去无害的主题是否在嘉士伯集团经营的其他市场会令人生厌或在文化上无法认同。
- ✓ 始终关注并尊重以下方面的多样性：人种、性别、性取向、宗教、颜色、种族、国籍、残疾、财富或职位。避免不适当的或有害的老套形象。在营销、选角及材料中积极推广多样化及包容性。
- ✓ 始终关注并尊重不愿与酒精发生联系的团体或个人。
- ✓ 始终审核传播及相关推广内容是否符合当地法律。若当地法律更为严格，则当地法律应优先于本政策。
- ✓ 鼓励及展示有利于环境可持续性的客户行为，比如包装回收。

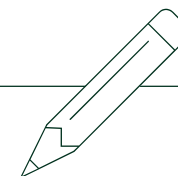
- ✓ 始终确保任何有关可持续性环境保护的主张以朴实的语言得到清晰传达，并能用可靠证据或科学数据证实，比如采用生命周期评估（LCA）或公认的认证计划（比如C2C认证）。如需获得支持，请联系公司事务部。

相关规范

- 嘉士伯集团的《多样化与包容性政策》
- 嘉士伯集团的《环保政策》

理性选择

回答以下问题，以确认您的认知及行为的正确性：



- ☒ 我的传播内容是否遵循当地有关酒类促销的法律及一般广告法？
- ☒ 我是否已评估我的传播内容对于目标观众及其他人群的适当性，是否具有较高的品味及是否得体？
- ☒ 我的传播是否推动、推进了社会包容性或在其中扮演了领导角色？
- ☒ 我们是否能用可靠的证据证实我们的环保声明？

8. 无酒精

提供无酒精啤酒，以负责任地方式营销

我们提供的无酒精啤酒让消费者在享受清爽可口的饮料的同时避免摄入酒精。我们的传播应始终针对成年人，而我们的无酒精啤酒应能与含酒精啤酒清晰地区分开来。

适用品牌

无酒精啤酒（AFB）

就本政策而言，无酒精啤酒（AFB）涵盖某个包含酒精品牌的一整条产品线上的任何酒精体积分数不高于0.5%的啤酒、果酒或苏打啤酒（例如，嘉士伯0.0），除非当地法规注明更低的酒精体积分数。符合上述标准的品牌必须遵循政策的全部规定，除例外情形或本节提供的额外要求以外。

与无酒精饮料有关的传播，若与酒精类品牌无关，应遵循当地软饮料条例及行业标准。

可为和不可为

- 始终遵循本政策阐述的标准，包括我们的传播内容应始终针对（原则#2）已满法定饮酒年龄的人群并对其产生吸引力（原则#1），除以下例外情形以外。

广告

- 应始终明确的事实是，我们在宣传无酒精产品。任何传播应确保无酒精啤酒（AFB）与我们的酒精类品牌不发生混淆。
- 若我们已证实了科学证据，仅提供有关健康或业绩福利的事实。仅在咨询公司事务部、集团发展部及当地法律团队后才能使用这些事实。

- 无酒精啤酒可与以下事项发生关联：
 - 驾驶：**对于会开车的消费者，我们可以负责任地推荐无酒精啤酒。但是，在推广无酒精产品时，必须注明只能在驾驶前后饮用，不得在驾驶过程中饮用。必须始终考虑当地的驾驶法规。必须始终获得您的当地法律及公司事务团队的批准。
 - 运动：**我们可以推广无酒精啤酒作为与非暴力及非极限运动（比如跑步或骑行）有关的提神物，但不能宣称其能提高成绩。必须始终获得您的当地法律及公司事务团队的批准。
- 我们的无酒精啤酒产品不得针对或涉及：
 - 孕妇：**不得针对孕妇进行传播，或描绘孕妇消费我们的无酒精啤酒。
 - 危险情形：**不得将我们的无酒精啤酒与危险或暴力情形联系在一起，比如极限运动或操作重型机械。

包装与广告

- 若可接受，我们的无酒精啤酒不会在传播中及包装上提供负责任饮酒提示。
- 外包装应有清晰的年龄限制符号或与法定饮酒年龄有关的词语。

8. 无酒精

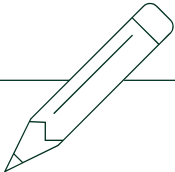
提供无酒精啤酒，以负责任地方式营销

销售点与活动

- ✓ 仅在已达到法定饮酒年龄的人群中进行抽样调查。
- ✗ 不得在儿童或青少年机构或其他专门针对低于法定饮酒年龄人群开放的场所（比如学校）出售无酒精啤酒。
- ✗ 不得在对低于法定饮酒年龄人群有特定吸引力的零售店（比如糖果或玩具）区域销售无酒精啤酒。

理性选择

回答以下问题，以确认您的认知及行为的正确性：



- ☒ 我的传播内容是否针对成年人？
- ☒ 我的传播内容是否注明该产品不含酒精？
- ☒ 我的传播内容是否注明该产品不含酒精？

合规与范围

合规与范围

合规

本政策代表嘉士伯集团所有品牌与实体应遵循的最低标准。合规是通过或代表我们的品牌进行传播的所有雇员及承包商的法定及个人责任。这同时适用文字与其精神实质。

许多情形下，我们的政策所包含的标准要比地方法规更为严格。但是，若地方法规更为严格，则其效力优于本政策。

培训

在开始受雇于嘉士伯集团时，所有营销雇员及代理商必须通过在线或面对面学习方式完成本政策中规定的培训内容。该培训应每年重复一次。

本政策构成所有相关代理合同的附录，其条款具有强制性。

支持

当地法律及公司事务团队能够在政策及地方法规的解释方面提供支持。在制订营销传播策略时应尽早咨询当地法律及公司事务团队。若存在疑问，或怀疑存在不合规现象，该事项已被报告给集团商业部及集团公司事务部。

范围

本政策涵盖：

- 含有酒精的所有产品与品牌
- 第11-12页描述的无酒精啤酒（AFB）

本政策适用代表上述两类品牌进行的任何传播，其渠道包括但不限于：

- 媒体：数字、广播、印刷、电影、户外广告、广告牌和产品植入。
- 销售点材料：酒具、服务材料/商品、电子商务和服装、通信和显示器。
- 赞助与公共关系：体育团队、体育馆、音乐节、有影响力的宣传者（包括运动员、艺术家）及媒体宣传。
- 推广：招揽消费者、店内促销、网上促销、贸易推广、产品体验、广告投放及活动安排。
- 品牌创新及产品开发：包装、标签及命名。
- 第三方渠道：向客户/供应商宣传我方品牌。

角色与责任

机构/职能/个人	角色与责任
执行委员会	负责政策审批
集团商业部（CCO）	政策执行人，就嘉士伯集团内部的营销传播事项向执行委员会承担全部责任，确保妥当处理集团内部的重大营销传播风险，及向执行委员会/审计委员会/监事会报告。
全球/地方营销总监	负责确保本政策得到执行及遵守，且所有相关雇员知晓本政策及其要求。
地方品牌所有人	负责核实及验证营销材料是否符合政策
地方法律顾问及公司事务部	负责核实营销材料是否符合法定要求/利益相关者意见/行业标准。
公司事务副总裁	事件升级后共同参与最终决策
集团法务副总裁	事件升级后共同参与最终决策
嘉士伯集团内部所有实体的管理层、雇员及合约工	负责遵循本政策



2021年3月
替代2019年9月版本

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J.C. Jacobsens Gade 1
1799 Copenhagen V
Denmark